



THE CITY OF NEW YORK  
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**BY ECF**

Honorable James L. Cott  
United States Magistrate Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Alexander Williams v. City of New York, et al.,  
19 Civ. 3347 (LJL) (JLC)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, and one of the attorneys representing defendants in the above-referenced action. I write to request that Mr. Aaron Davison, of this Office, be granted permission to conduct Plaintiff's deposition on behalf of defendants. Mr. Davison has passed the New York state bar exam and is pending admission. At the deposition, Mr. Davison will be supervised by an admitted attorney from this Office who has appeared in this action.

By way of background, Plaintiff is a pre-trial detainee in the custody of the New York City Department of Corrections ("DOC"). Plaintiff alleges that between January 20, 2019 and July 14, 2020, defendants, correction officers at Manhattan Detention Center ("MDC"), opened and read his outgoing and incoming mail, denied him access to the law library, ignored and did not process his grievances, denied his ability to timely mail summonses and complaints to correction officers he was suing in a state court proceeding, retaliated against him, used excessive force against him by spraying him with a chemical agent, and denied him adequate medical care. (See Williams I, Compl., pp. 4-5; Williams II Compl., pp. 4-5, 7-11; Williams III Am. Compl. 4, 6-14, and 21.)

Since February 2020, Mr. Aaron Davison has handled this matter under the supervision of admitted attorneys who have appeared in this action. He has reviewed all discovery and discussed the case with the defendants. As such, he is familiar with the facts and procedural progression of the case.

Accordingly, I respectfully request that Mr. Aaron Davison be granted permission to conduct Plaintiff's deposition under the direct supervision of admitted attorneys in this Office.

Sincerely,

*Joshua A. Weiner*  
Joshua A. Weiner  
*Senior Counsel*

cc: All Counsel (VIA ECF)